

**IN THE UNITED STATES DISTRICT COURT FOR THE  
NORTHERN DISTRICT OF WEST VIRGINIA**

**UNITED STATES OF AMERICA,**

**v.**

**Criminal Case No.: 5:22-MJ-57**

**ROGER ALLEN WOODS, II,**

**Defendant.**

**AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT AND ARREST WARRANT**

I, Jason R. Kocher, being duly sworn, depose and states as follows:

1. On Thursday, April 28, 2022, the Ohio Valley Drug Task Force (“OVDTF”) utilized a Confidential Informant (“CI”) to complete a controlled purchase of cocaine from PERSONNE E. MCGHEE aka “Rico” (“MCGHEE”).
2. Prior to the controlled purchase, the CI arranged the meeting with MCGHEE via text message. Task Force Officers (“TFOs”) also outfitted the CI with audio/video recorders and provided the CI with \$2,400 in recorded OVDTF funds. The CI then waited for MCGHEE in the area of Greco’s (45 Washington Avenue, Wheeling, Ohio County, West Virginia, 26003).
3. MCGHEE was observed leaving his residence in Bellaire, Ohio, driving a black 2013 Dodge Ram pickup truck bearing Ohio registration JVF3960.
4. Soon after, MCGHEE drove to the area of Greco’s parking lot, and the CI entered MCGHEE’s truck. MCGHEE and the CI then traveled to the area of the Alpha Tavern (50 Carmel Road, Wheeling, Ohio County, West Virginia, 26003).
5. The CI later told TFOs that while inside MCGHEE’s truck, MCGHEE motioned for the CI to put the money in the cupholder of the truck.
6. The CI told TFOs that MCGHEE distributed the suspected cocaine to the CI while they

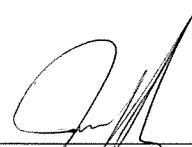
were in the area of the Alpha Tavern.

7. Following the distribution by MCGHEE, the CI exited MCGHEE's truck and soon met with TFOs. The CI provided TFOs the purchased, suspected cocaine which was packaged in a clear bag. The approximate packaged weight of the cocaine was 61.39 grams and field tested positive for cocaine, a Schedule II controlled substance.
8. Based on the investigation into MCGHEE, TFOs believed that ROGER ALLEN WOODS, II, was assisting MCGHEE, in part, by driving to the Pittsburgh International Airport in Pittsburgh, Pennsylvania (Western District of Pennsylvania) to meet CHRISTOPHER JASON KIRK, and others, where an exchange for money and/or drugs would take place. In addition, TFOs have observed MCGHEE meeting with KIRK at the Pittsburgh International Airport. On April 22, 2022, Investigators observed both McGhee and Woods in the area of the Pittsburgh and then traveled back to the Bellaire, Ohio area. Since that date, TFOs have observed WOODS travel to the airport on at least 8 occasions and meet with KIRK and others.
9. On October 18, 2022 TFOs observed WOODS and a female travel to the Pittsburgh International Airport and again meet with KIRK. TFOs subsequently executed a search warrant on WOODS' Chevrolet Cruze and recovered a large amount of US Currency from the glove compartment. In an interview with the female, TFO Burke was advised that she had been on three trips to the airport with WOODS. When they arrived the airport, WOODS would lay a package of US Currency in the backseat and the person whom they picked up would take the money. Investigators believe that the money is payment for drugs as KIRK is a <sup>resident</sup>~~residence~~ of California and makes trips to Pittsburgh to meet WOODS and/or MCGHEE for a brief period of time before flying back to California in the same day.

10. Based on the foregoing, TFOs have probable cause to believe that WOODS, KIRK, and MCGHEE did unlawfully, knowingly and intentionally combine, conspire, confederate, agree and have a tacit understanding to violate Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C). It was the purpose and object of the conspiracy to possess with the intent to distribute and distribute a mixture and substance containing a detectable amount of cocaine, a Schedule II controlled substance; in violation of Title 21, United States Code, Sections 846 and 841(b)(1)(C), in the Northern District of West Virginia and elsewhere, to include the Southern District of Ohio and the Western District of Pennsylvania.

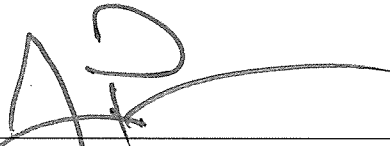
**OATH**

I swear and affirm under penalty of perjury that the information in this affidavit is true to the best of my knowledge and belief.



\_\_\_\_\_  
Jason R. Kocher  
DEA Task Force Officer  
Ohio Valley Drug Task Force

Subscribed and sworn to me on this 18<sup>TH</sup> day of October, 2022.



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James P. Mazzone  
United States Magistrate Judge  
Northern District of West Virginia